



South Coast  
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

**FAXED: NOVEMBER 29, 2007**

November 29, 2007

Ms. Kathleen Dale  
City of Moreno Valley  
Community Development Department  
14177 Frederick Street  
Moreno Valley, CA 92553

Dear Ms. Dale:

**Mitigated Negative Declaration (MND) for  
Box Springs Road Apartments, TTM 35414**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated Negative Declaration. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith., Ph.D.  
Program Supervisor  
Planning, Rule Development & Area Sources

Attachment

SS: CB

SBC071031-04  
Control Number

**Mitigated Negative Declaration (MND) for the**  
**Box Springs Road Apartments**

**1. URBEMIS 2007**

The lead agency should be aware that URBEMIS 2007 is now available and should be used for future air quality analysis instead of URBEMIS 2002. Since the air quality analysis was prepared before URBEMIS 2007 became available in June 2007, use of URBEMIS 2002 is acceptable for this project. URBEMIS 2007 is available at the following website: [www.urbemis.com](http://www.urbemis.com).

**2. Project Emissions**

On page 7 of the MND the lead agency states that estimated emissions for both construction and operation are less than the relevant significance thresholds recommended by the SCAQMD. The Air Quality Analysis document prepared for the proposed project shows that PM10 emissions during construction exceed the SCAQMD's recommended localized significance threshold (LST) for PM10. Four mitigation measures are listed to reduce construction PM10 emissions to less than the PM10 LST. The four PM10 mitigation measures are not listed in the MND. The SCAQMD requests that the four mitigation measures identified in the Air Quality Analysis document be listed in the Final MND and included in the mitigation monitoring plan (CEQA Guidelines Section 15097).

**3. Siting of Sensitive Land Uses Near Freeways**

On page eight of the MND, the lead agency acknowledges that future residents of the proposed project will be exposed to pollution, including air toxics, generated by vehicles using the adjacent State Route (SR) 60 freeway and nearby I-215 freeway. The lead agency then asserts significant adverse sensitive receptor impacts will not occur for the following reasons. According to California Air Resources Board (CARB)'s *Air Quality and Land Use Handbook: A Community Health Perspective*, there is a substantial drop in health risk in the first 300 feet from a toxics source. Buildings 1 through 7, Building 12 and the recreation area are beyond this 300-foot distance and, therefore, exposures to these residences would not be significant. Although it is true that CARB states that there is a substantial dropoff in risk at 300 feet, it still recommends a buffer of 500 feet.

Buildings 9 through 11 are completely within the 300-foot distance to SR 60, with Building 11 being only 70 feet from SR 60, and Building 8 partially within the 300-foot distance. The lead agency proposes as a mitigation measure for these buildings

an advanced HVAC system. The problem with this mitigation measure is that there is no provision to ensure that the advanced HVAC system is maintained properly in the future. The SCAQMD recommends that the lead agency require the project proponent to reconfigure the project so that all buildings are at least 300 feet from SR 60. Further, all residences should have the advanced HVAC system installed. The lead agency should also require the project proponent to demonstrate how the HVAC system will be maintained in the future to maximize air filtration. Finally, the SCAQMD recommends that a health risk assessment be performed to ensure that risk at the residences do not exceed background levels.

#### 4. **Localized Significance Threshold Analysis**

The variable emission factors for hour-of-day were set to 1.0 from 7:00 am to 2:00 pm; however, the emission rate of  $3.04 \times 10^{-6}$  g/(s-m<sup>2</sup>) was estimated by dividing the daily emissions by 24-hours per day then 3,600 seconds per hour. By using an emission rate based on 24-hours and the variable emission factors, the resultant estimated PM10 concentration is under reported. Since the variable emission factors are set for eight hours, the emission rate should be based on eight hours. Alternatively the variable emission factors can be removed and the model run with an emission rate based on 24-hours. The emission rate and the use of variable emission factors should be consistent in the final mitigated negative declaration.